

October 27, 2005

Editor Fire Apparatus Magazine 234 Monarch Hill Road Tunbridge, VT 05077

Dear Editor.

This letter is in response to the article released in October 2005 Fire Apparatus Magazine titled "FEMA Wants All SCBA Replaced." I would like to bring to your attention some factual misrepresentations and provide clarity for our user community who may have been confused by Mr. Jorgensen's statements.

First, I would like to address comments regarding the structure and sponsorship of the InterAgency Board (IAB). The IAB was originally formed in 1998 by the Attorney General of the United States and sponsored by the Department of Defense and Department of Justice. The mission then and today is "to establish and coordinate local, state, and federal standardization, interoperability, and responder safety to prepare for, respond to, mitigate, and recover from any incident by identifying requirements for Chemical, Biological, Radiological, Nuclear, or Explosive (CBRNE) incident response equipment."

The work of the IAB focuses on: identifying existing (or gaps in) technology, standards, and test results that can be used by first responders to make more knowledgeable decisions in purchasing CBRNE incident equipment.

The IAB executes its mission with a membership of 125, encompassing state, local, and federal first responders with additional members working in the areas of research, testing, and standards development. The responders provide a broad cross section of disciplines including Fire, Law Enforcement, SWAT, Haz-Mat, EMS, Public Health, Emergency Managers, Civil Support Teams, Public Utilities, and transportation. Each of these disciplines and the individuals who have been chosen to represent them by their communities bring a great deal of expertise and practical experience to the table.

The InterAgency Board's initial work identified commercially available hazardous materials equipment and protective ensembles that were being marketed by manufacturers and salespeople as being capable of performing in CBRNE environments. The IAB worked to identify whether there were existing standards and independent test results available that could validate what was being presented to responders in purchasing departments. In many cases there were none and these first responder needs were prioritized and pushed upward to the Federal Agency Coordinating Committee (FACC) of the IAB.

This federal committee today consists of representatives of the Department of Defense (DoD), Department of Homeland Security (DHS)-Office of Domestic Preparedness (ODP), DHS-Standards and Technology Directorate (S&T), DHS-Office of Interoperable Communications (OIC), National Institute of Standards & Technology- Office of Law Enforcement Standards (NIST-OLES), DHS- Office of NIMS Integration, DHS-Federal Emergency Management Agency (FEMA), OSHA, and NIOSH-National Personal Protective Technologies Laboratory (NPPTL).

These representatives work to budget funds and identify testing facilities that could validate the sales pitches being sold to first responders. Early work led to the new CBRNE standards for SCBA's, Air Purifying Respirators (APRs), Escape Masks and soon for Powered APRs. Recent testing of radiological instruments against newly written standards for emergency use, improved chemical ensembles, prototype CBRNE fire service bunker gear, Hand Held Assays (HHAs) for field testing of biological agents and chemical agent detector testing are among several other initiatives. All there efforts are in some way the result of recommendations from the IAB to its federal partners. These decisions are all made with the end user, the local, state and federal responders', safety in mind. Many purchasing agents are under strict timelines for spending federal grant money and too often it is being used to buy equipment that may not actually perform to the level touted in the marketing presentation.

The Standard Equipment List (SEL) is produced and maintained by the IAB to provide first responders with a basic source for equipment information that should be considered when making CBRNE procurement decisions. The SEL is aligned with the first eleven categories of the Authorized Equipment List (AEL) that DHS-ODP uses as a guideline for approving grant requests. A hard copy of our annual report and the SEL can be requested via our website <a href="https://www.iab.org">www.iab.org</a>. Additional information and electronic versions of both lists can be found on the Responder Knowledge Base (RKB) website, <a href="https://www.mipt.rkb.org">www.mipt.rkb.org</a>, sponsored by the Memorial Institute for the Prevention of Terrorism. This website provides links to standards, test results, certifications, manufacturers' products, and user comments, all extremely helpful information to the purchasing agents and field users of the first responder community. This site has received a lot of user support from the local, state and federal members of the IAB and the first response community.

I provide this background to better educate you and your readers on the good work of the IAB. I am concerned that neither myself, nor the IAB Program Managers were contacted for comment before this article was published. I would like to take this opportunity to provide clarity on several statements included in the before-mentioned article.

Chief Tobin was quoted as stating that the IAB is an element of the Department of Homeland Security. In fact, DHS departments do provide funding to the IAB, but there are several other contributing agencies (indicated above) and no single agency provides authority. The IAB prioritizes first responder needs in the various disciplines and sends them up to all involved federal entities to assist the user communities' efforts in better preparing for incidents. What does come down from the federal partners are requests to provide user input and direction to federal entities to assist them in our subject areas. The IAB works diligently to provide a unified cross-disciplinary voice of first responders that has no allegiance other than to the emergency response community.

The article states that "the IAB is charged with working on communications interoperability and have not succeeded." The IAB is not charged with the issue of making communications interoperable. There are federal, state and local agencies that are charged with that mission. The IAB works with these agencies to identify needs in standards and technology not only in communication related areas but across the full response equipment field.

Mr. Jorgenson also states that "the IAB is confident its planned change to NFPA 1981 will be adopted and is on schedule for Mandatory Compliance in August 2007." It would seem difficult at best to write a quote from an organization if you did not speak to the IAB Chair or Program Managers.

It was also written that the IAB submitted a proposal to the NFPA committee on standardizing cylinders for the purpose of interoperability. The IAB did not submit a proposal; in fact the IAB sent only one letter to the 1981 committee. That letter, written on November 23, 2004 is attached for your review. It states that "the IAB is requesting that NFPA address the issue of a Tentative Interim Agreement (TIA) to standard 1981 to make interoperability of SCBA cylinders a requirement." The letter "requests that the committee make this a priority issue," and followed with the statement that "we understand there are technical and equipment issues that need to be addressed to make interoperability a reality." This letter simply raised the concerns of the user community and asks that the issue be thoroughly considered.

The article also states that "the IAB proposal would outlaw the Scott Snap-Change feature." The IAB did not issue any proposals and certainly did not, and does not as a practice, identify vendor specific products or features.

I spoke with Ray Reed, the NFPA 1981 committee chair, and asked for his comments on the issue. He was very open and discussed both sides of view. The issue of cylinder interoperability has been around for some time. In fact, it appears in the current edition of the NFPA 1981 standard as a project to be looked at for future research and review. Apparently this review had reached a roadblock within the committee and needed some catalyst to move it one way or another. The IAB was approached as a voice of the user community, by the NFPA staff liaison to 1981 (who is also a member of the IAB), to facilitate action on this issue. After IAB review and discussion, it was the consensus that a letter be sent to the NFPA Standards Council to have the committee make this a priority issue. The IAB has not taken any further action on this issue.

The IAB discussed and recognized that there are issues of backwards compatibility, NIOSH certification (which are being addressed by NIOSH), and of course funding. These are all very real issues and should be looked at by all users, especially where financial impact can become a deal breaker. It may come to pass that addressing cylinder interoperability is not practical right now, but we believe it should be looked at in the interest of the users and their needs and this was the intent of our communication with NFPA. The emergency service community deserves this in depth presentation of technical information, not a paragraph on whether we will be able to buy yellow or blue cylinders.

As it stands, the NFPA 1981 committee membership has voted to send the 1981 document out for public comment. Public comment will allow all interested parties to express their concerns and comments to the committee for review and response. Some

issues that should be considered are a more in-depth review of the backwards compatibility concerns including adaptor kits and cost, NIOSH certification which all users should push for, and federal funding. If the comment process shows that the proposed language is not a practical solution at this time, then it should be removed. The IAB strongly encourages all responder communities to be involved in standards development, technology needs, legislation, and federal funding.

I encourage your magazine to concentrate on what the implications might be to the end user and to provide them with the full extent of information to assist them in making their comments and votes on this issue count. The IAB's membership, representing the emergency service community from across the country, from large and small agencies, is proud to continue to work to address areas of concern for the community as a whole.

As an additional note I encourage you to contact one of our members Jim Schwartz, Chief of the Arlington County Fire Department, for better information on who the lead Fire Department and incident commander was for the September 11, 2001 attack on the Pentagon.

Please contact me if I can provide further assistance or information on the work of the IAB or this issue.

Respectfully,

Robert J. Ingram, Chair-IAB

Chief-in-Charge, Haz-Mat Operations

**FDNY**